

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Report on Rural Broadband Strategy)	GN Docket No. 09-29
)	

To the Commission:

Comments of Alaska Communications Systems

In response to the Federal Communications Commission ("FCC" or "Commission") Public Notice in this proceeding issued on March 10, 2009, Alaska Communications Systems¹ ("ACS") offers the following comments.

Introduction

ACS notes that this matter is one of two proceedings before the Commission that address the issues of Broadband Strategy.² In addition to this inquiry, the FCC has also been directed by Congress to evaluate and report on its broadband findings as part of the American Recovery and Reinvestment Act of 2009³ ("ARRA"). While ACS appreciates the opportunity to provide its initial comments on this important area of Commission inquiry, it views this opportunity as preliminary in nature. Given the scope and breadth of ARRA, ACS anticipates an even deeper level of analysis will occur in the next FCC proceeding. In that spirit, ACS will offer comments here that will form the basis of its

¹ ACS of Alaska, Inc.; ACS of Anchorage, Inc.; ACS of Fairbanks, Inc.; ACS Long Distance, Inc.; ACS of the Northland, Inc.; and ACS Wireless, Inc.

² The instant docket was prompted by the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) H.R. No. 6124, 110th Congress, 2nd Session, 2008.

³ H.R. No. 1, 111th Congress, 1st Session, 2009.

subsequent participation in the ARRA docket. As the FCC moves forward to comply with the Congressional mandate to issue a Farm Bill-related report by May 2009, it should look ahead to its more detailed evaluation under ARRA to ensure that positions articulated now can be fully reconciled with its ultimate resolution of strategic broadband issues yet to be determined.

Discussion

I. The FCC should focus on principled recommendations at this juncture and apply those principles to a more detailed analysis in the ARRA docket.

Congressional mandates in both the Farm Bill and in the ARRA set out broad goals and task the three implementing agencies with creating detailed definitions, eligibility requirements and specific plans to meet legislative objectives. The FCC should use the instant opportunity to further develop and prioritize these broad statements, thereby providing a useful segue to the Commission's subsequent and more substantive effort. Included in the statutory list of goals are: near term job creation, broadband deployment to "unserved" and "underserved" areas, addressing the needs of vulnerable populations, extending competitive choice and other public interest criteria. As the FCC considers this list, ACS encourages emphasis on the following areas.

II. In its report to Congress, the FCC should emphasize specific goals and attempt to balance other competing considerations.

ACS recommends inclusion of the following items in the FCC's report:

- Sustainability must be a primary consideration. Simply building new infrastructure is inadequate to achieving legislative and policy goals. It will not serve the public interest to extend broadband capabilities to

unserved and underserved areas if the critical mass necessary to maintain operational viability is lacking. There are many components of broadband sustainability. Basic infrastructure is one. Actual access to the public Internet based on economically available backhaul facilities is another. The presence of anchor community and business subscribers are also key components. Finally, in some circumstances, it may be necessary to provide ongoing operational support to ensure affordable broadband access to mass market consumers. The FCC is urged to place the appropriate focus on sustainability as it begins to outline its broadband strategy for the nation.

- On a related note, the FCC and the federal government generally, must take care not to sacrifice significant historical gains in the provision of basic universal service as it attempts to carve out a place for future broadband deployment. Basic voice and other essential access services are available today in high cost and insular areas based, in no small measure, on the availability of federal and state universal service support mechanisms.⁴ The FCC must ensure that the availability of such basic services is not inadvertently threatened in our zeal to promote broadband services.
- The ARRA makes specific reference to broadband mapping and provides a limited level of funding for this effort. However, the legislation is not

⁴ Voice-grade access to the public switched network; Local access; Dual-tone multi-frequency signaling or its functional equivalent; Single-party service or its functional equivalent; Access to emergency services; Access to operator services; Access to interexchange service; Access to directory assistance; and Toll limitation for qualifying low-income consumers. 47 C.F.R. § 54.101 (a).

clear as to how these dollars will be used. Broadband mapping is an indispensable precursor to the development and implementation of a comprehensive broadband strategy. The FCC should continue to recommend advances in this area and advocate for the funding necessary to carry out this mandate. The mapping process will, of necessity, rely heavily on the inputs of service providers as databases are being populated. In this regard, standard formats, data sets and interfaces will be essential. To the extent that providers do not have this capability today, or are required to modify their systems to meet government requirements, unfunded mandates must be avoided.

III. Interagency coordination is a crucial element of developing and implementing a meaningful broadband strategy.

The majority of the FCC's Public Notice in this matter addresses issues surrounding interagency coordination.⁵ ACS does not offer specific comments at this

⁵ As excerpted from the FCC's March 10, 2009 Public Notice:

On May 22, 2008, Congress adopted the 2008 Farm Bill. Section 6112 of that statute requires the Chairman of the Federal Communications Commission, in coordination with the Secretary of Agriculture, to submit a report to Congress describing a comprehensive rural broadband strategy within a year of the passage of the Act. The Act specifies that the report shall include:

(1) recommendations—

- (A) to promote interagency coordination of Federal agencies in regards to policies, procedures, and targeted resources, and to streamline or otherwise improve and streamline the policies, programs, and services;
- (B) to coordinate existing Federal rural broadband or rural initiatives;
- (C) to coordinate both short- and long-term needs assessments and solutions for a rapid build-out of rural broadband solutions and application of the recommendations for Federal, State, regional, and local government policymakers; and

time regarding interagency coordination other than to underscore the essential nature of such synchronized action. Congress has directed multiple federal agencies, in particular the Departments of Agriculture and Commerce and the FCC, to work together to formulate and execute a nation-wide broadband strategy. As such, ACS commends the agencies for the efforts already expended⁶ and encourages them to formalize their ongoing mutual efforts to comply with Congressional directives. Only by putting forth a coordinated plan can we avoid costly duplication or worse, inconsistent strategic implementation targets. ACS looks forward to working with agencies on the multiple fronts that will be deployed to tackle the critically important broadband issues.

Respectfully submitted,

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(D) to identify how specific Federal agency programs and resources can best respond to rural broadband requirements and overcome obstacles that currently impede rural broadband deployment; and

(2) a description of goals and timeframes to achieve the purposes of the report.

⁶ To date, the agencies have conducted a total of six meetings to discuss broadband issues generally and the requirements of ARRA specifically.